1 2 3	DANIEL G. BOGDEN United States Attorney District of Nevada JUSTIN E. PINGEL Assistant United States Attorney Nevada State Bar No. 10186	
4	333 Las Vegas Boulevard South, Suite 5000 Las Vegas, Nevada 89101	
5	Telephone: (702) 388-6336 Facsimile: (702) 388-6787	
6	justin.pingel@usdoj.gov	
7	Attorneys for the United States.	
8		
9		
10		
11	UNITED STATES DISTRICT COURT	
12	DISTRICT OF NEVADA	
13	ROSEMARY GARITY,	
14	Plaintiff,	Case No: 2:11-cv-01805-MMD-CWH
15	V.	
16	USPS PMG PATRICK DONAHOE,	
17	Defendant.	
18		
19	MOTION FOR EXTENSION OF TIME (First Request)	
20		
21	The Federal Defendant USPS PMG Patrick Donahoe respectfully requests an extension of time	
22	of four (4) days, up to and including March 28, 2014, to file a reply to Plaintiff's Opposition (ECF	
23	#153) to Federal Defendant's Motion to Compel (ECF #148) currently due on March 24, 2014.	
24	In support of the instant Motion, the Federal Defendant submits the following:	
25	1. This Motion is brought in order to accommodate the undersigned counsel for the Federal	
26	Defendant.	

- 2. The requested extension of time is necessary in order for Government counsel to prepare an adequate reply. As stated in previous requests, Government counsel continues to be heavily involved in this case, as well as other time-consuming cases which have demanded much time preparing for hearings, depositions, discovery and the like, leaving little time to respond to numerous, contemporaneous filings by Plaintiff. In addition, Government counsel will be out of the state from March 31 to April 4, 2014, attending mandatory training and must also complete other pending issues prior to that extended travel.
- 3. Government counsel does not seek a significant extension of time, and the reply will be filed ten (10) days before the scheduled hearing on April 8, 2014.
 - 4. The instant motion is filed in good faith and not for the purposes of delay.

WHEREFORE, for the above reasons, Federal Defendant respectfully requests the instant Motion extending time of four (4) days, until March 28, 2014, be granted.

Respectfully submitted this 21st day of March 2014.

United States Attorney

/s/ Justin E. Pingel

DANIEL G. BOGDEN

JUSTIN E. PINGEL
Assistant United States Attorney

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: March 24, 2014